REMARKS

Applicant respectfully requests consideration of the subject application.

Office Action Objections and Rejections Summary

Claim 1 has been objected to because of informalities. Claims 4 – 5, 17, 21 – 25, and 47 have been objected to as being dependent upon a rejected base claim. Claims 1 – 3, 6 – 15, 18 – 20, 26 – 30, 32 – 36, 45, 48 – 55, and 57 – 58 have been rejected under 35 U.S.C. §102(b) as being anticipated by Admitted Prior Art, pages 1 – 4 (hereinafter "APA"). Claims 37 – 43 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,366,582 to Nishikado et al. (hereinafter "Nishikado"). Claims 16, 31, 46, 50, and 56 have been rejected under 35 U.S.C. §103(a) as being unpatentable over APA in view of U.S. Patent No. 6,275,493 to Morris et al. (hereinafter "Morris").

Status of Claims

Amendments to the claims are presented hereto in the interest of overcoming Examiner's objections and rejections. Claims 1 – 58 remain pending in this application. Claims 1, 6, 9, 27, 34, 37, 40, 44, and 52 have been amended. The amendments are supported by the specification and no new matter has been added. No claims have been canceled. No new claims have been added. Applicant reserves all rights with respect to the doctrine of equivalents.

Claim Objections

Claim 1 has been objected to because of informalities. Claim 1 has been corrected with the insertion of "node" after "to the second" in line 4.

Rejections under 35 U.S.C. §102(b)

Claims 1 – 3, 6 – 15, 18 – 20, 26 – 30, 32 – 36, 44, 45, 48 – 55, and 57 – 58 have

been rejected under 35 U.S.C. §102(b) as being anticipated by APA. Applicant respectfully

submits that claims 1 – 3, 6 – 15, 18 – 20, 26 – 30, 32 – 36, 44, 45, 48 – 55, and 57 – 58 are

patentable over the APA. The APA provides a method for clearing connections of a port

between a first node and a second node. In particular, the APA provides:

> ATM based networks can maintain a large number of connections per
> port and the task of clearing (disconnecting) all connections of a port is
> inefficient using the ATM Forum provided prior art. In order to clear a
> Virtual Channel, the ATM Forum prior art provides a message called
> RELEASE and a corresponding message called RELEASE COMPLETE.
> Well known to those skilled in the art, the RELEASE and the RELEASE
> COMPLETE message are each transmitted along the signaling channel
> between connecting nodes. *A first network node issues a separate*
> *RELEASE message for each connection*, and transmits the RELEASE
> message to connecting nodes for propagation along the network for
> eventual reception by a second network node. The second network node
> then initiates and transmits a corresponding RELEASE COMPLETE
> message as an acknowledge to the RELEASE message for that separate
> connection that is transmitted across the network to the first network
> node.   (emphasis added)

(Application as filed, page 1, lines 21 – 25, and page 2, lines 1 – 7).

The APA also provides:

> As illustrated, because the current RELEASE and RELEASE COMPLETE
> messages together clear only a single connection, in order to clear a port
> *all data connections at the port must be cleared separately by*
> *issuance of multiple RELEASE and RELEASE COMPLETE*
> *messages*, one pair for each connection. If there is network congestion,
> a connection clearance in accordance with the ATM Forum prior art may
> require a retransmission. Thus a single connection, while requiring a
> minimum of two messages, may require more than two messages per
> connection, and a port having more than "n" connections while requiring a
> minimum 2 "n" messages, may require many more messages than that
> number. Each RELEASE and each RELEASE COMPLETE message
> consumes network resources including processor time, memory time,
> processor bus time, node transmission bus time, and node switch time; all
> of which impact overall node transmission bandwidth and hence network
> performance.   (emphasis added)

(Application as filed, page 3, lines 16 – 24, and page 4, lines 1 – 4, and Figure 2).

As such, the APA provides no method for identifying and clearing multiple connections with a single release message. Each connection requires a separate release message.

In contrast, independent claims 1, 6, 9, 27, 34, 44, and 52 have each been amended to include the limitation of "a single bulk release message" that identifies and instructs multiple connections to be cleared. As such, applicant respectfully submits that claims 1, 6, 9, 27, 34, 44, and 52 are patentable over the APA and requests removal of the rejection under 35 U.S.C. §102(b).

Claims 2 – 5 depend from independent claim 1, claims 7 – 8 depend from independent claim 6, claims 10 – 26 depend from independent claim 9, claims 28 – 33 depend from independent claim 27, claims 35 – 36 depend from independent claim 34, claims 45 – 51 depend from independent claim 44, and claims 53 – 58 depend from independent claim 52. As such, these dependent claims include the limitation of, "a single bulk release message." Accordingly, applicant respectfully submits that these dependent claims are also patentable over the APA and request removal of the rejection.

Claims 37 – 43 have been rejected under 35 U.S.C. §102(e) as being anticipated by Nishikado. Applicant respectfully submits that claims 37 – 43 are patentable over Nishikado. Nishikado discloses a network management unit for ATM exchanges. In particular, Nishikado includes the following disclosure:

> The flow of the procedure then goes on to a process 105 in which, *in each of the connection switching exchange systems 1 receiving the command in the process 104, the connection setup/release mechanism 10 employed in the connection switching exchanges 1 receives the command and sets up the switching table 4 in a batch operation* so as to carry out the switching of the logical connections in the specified group of logical connections from the specified input communication lines to the specified output communication lines by using the specified connection identifiers as they are without modifying the values of the connection identifiers.   (emphasis added)

(col. 14, lines 40 – 51, and Figure 4)

It appears that the method of Nishikado generates separate release messages for each connection switching exchanges systems. Nothing in Nishikado discloses a single bulk release message for all of the connections.

In contrast, amended independent claims 37 and 40 each include the limitation of, "a single bulk release message" that identifies and instructs multiple connections to be cleared. As such, applicant respectfully submits that claims 33 and 40 patentable over the APA and requests removal of the rejection under 35 U.S.C. §102(e).

Claims 38 – 39 each depend from independent claim 37 and claims 41 – 43 each depend from independent claim 40. As such, these dependent claims include the limitation of, "a single bulk release message." Accordingly, applicant respectfully submits that dependent claims 38 – 39 and 41 – 43 are also patentable over the APA and request removal of the rejection under 35 U.S.C. §102(e).

Rejections Under 35 U.S.C. §103(a)

Claims 16, 31, 46, 50, and 56 have been rejected under 35 U.S.C. §103(a) as being unpatentable over APA in view of Morris. Applicant respectfully submits that claims 16, 31, 46, 50, and 56 are patentable over APA in view of Morris. Claim 16 depends from independent claim 9, claim 31 depends from independent claim 27, claims 46 and 50 depend from independent claim 44, and claim 56 depends from independent claim 52. As such, claims 16, 31, 46, 50, and 56 include the limitation of, "a single bulk release message." As discussed above, nothing in APA discloses this limitation. Morris discloses a method for managing Switched Virtual Circuits and Switch Cross-connects to support ATM networks. In particular, Morris includes the following disclosure:

> The SVC control agent 26 is responsible for SVC setup and release.
> Each of the SVC selector 24 and the caching manager 28 may request
> the SVC control agent 26 to perform an SVC operation such as the setup

or release of an SVC. The SVC control agent 26 also communicates with the communications application 22 to inform the communications application 22 when an SVC is released if the communications application 22 requires such information.

(Morris, col. 5, lines 54 – 62)

It appears nothing in Morris discloses or suggests the use of a single bulk message to identify and clear multiple connections. As such, Morris fails to cure the deficiency of the APA.

It is respectfully submitted that Morris and APA do not teach or suggest a combination with each other. It would be impermissible hindsight, based on applicant's own disclosure, to combine Morris and APA.

Applicant also respectfully submits that there is no motivation to combine Morris and APA. The Examiner has stated the following:

> Regarding claims 16, 31, 46, 50, and 56, the APA fails to explicitly disclose ATM node includes a database of the first connections that are cleared from the ATM node, and a data base of the first connections that are cleared from the ATM node from which are deleted the second connections in the received second message type. Morris, on the other hand, discloses ATM nodes, which include ATM switches and cross-connect apparatus, use routing tables to map VCI and VPI values received in an incoming cell to outgoing values used to select an outgoing link as a way of routing the associated cell through the ATM node. Therefore, it would have been obvious to one having ordinary skill in the art at the time of invention was made includes the teaching of Morris in the ATM nodes of APA for the table or database is essential part of the ATM communication for maintaining the VCINPI for active connections.

Here, the Office Action merely states an advantage of substituting the ATM nodes from Morris with the method of the APA without explaining what specific understanding or technological principle within the knowledge of one of ordinary skill in the art would have suggested the combination.

Even if the Morris and APA were combined, the combination would still not include all the limitations of independent claims 9, 27, 44, and 52, in particular, the limitation of, "a

single bulk release message." As claims 16, 31, 46, 50, and 56 depend from one of independent claims 9, 27, 44, and 52, applicant respectfully submits claims 16, 31, 46, 50, and 56 are patentable over Morris and APA under 35 U.S.C. §103(a).

In conclusion, applicant respectfully submits that in view of the arguments and amendments set forth herein, the applicable objections and rejections have been overcome.
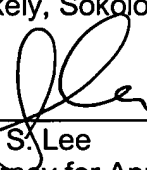
If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Suk Lee at (408) 720-8300.

If there are any additional charges, please charge our Deposit Account No. 02-2666.

Respectfully submitted,

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